

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

LARRY FRAZIER,)	
)	
Plaintiff,)	
)	
v.)	No. 19–cv–50121
)	
WEXFORD HEALTH SOURCES, INC.,)	District Judge:
CGH MEDICAL CENTER, and)	Iain D. Johnston
MERRILL ZAHTZ, M.D.,)	
)	Magistrate Judge:
Defendants.)	Margaret J. Schneider
)	

JOINT STATUS REPORT

NOW COMES the Plaintiff, LARRY FRAZIER, and the Defendants, WEXFORD HEALTH SOURCES, INC. and DR. MERRILL ZAHTZ, M.D. (together, “Wexford”), and CGH MEDICAL CENTER (all, collectively, the “Parties”), through their respective undersigned counsel, and, for their Joint Status Report regarding the status of discovery, state as follows:

1. The Parties apologize to Court for the untimeliness in filing this updated Joint Status Report. The last Joint Status Report presented to the Court regarding the status of discovery was on April 26, 2022. (Dkt. #173).
2. Pursuant to this Court’s Order of April 26, 2022, a status report was to be filed by June 29, 2022. (Dkt. #174). On July 8, 2022, the Court extended the time for the Parties to file a Joint Status Report to July 15, 2022. (Dkt. #184).
3. As the court is aware, Plaintiff and his appointed counsel participated in a judicial settlement conference with Magistrate Judge Schneider on July 13, 2022, and reached agreement in principle to resolve his case against with Defendant, CGH Medical Center via settlement. These parties are working on exchanging settlement documents.

4. Additionally, as previously indicated in the Parties' last Joint Status Report, the Parties were unable to complete the deposition of Plaintiff within the allotted three (3) hour period provided by the prison staff. As a result of the three-hour cutoff, the Wexford defendants who questioned Mr. Frazier after CGH Medical Center, were denied to opportunity to fully examine Mr. Frazier on the basis of claims in this matter. The Wexford defendants intend to proceed with the continued deposition of Mr. Frazier and are in the process of arranging the same.

5. Plaintiff's appointed counsel anticipates taking the depositions of Dr. Zahtz, Wexford's designated Rule 30(b)(6) witness(es), and an additional medical professional(s) from Dixon Correctional Center.

6. The Wexford defendants have requested the depositions of two of plaintiff's medical providers at CGH Medical Center. Counsel for CGH Medical Center indicated that he will be on trial in August and September and will be unable to present these witnesses until early October 2022.

7. In light of the foregoing, the various deadlines set by this Court's Order from April 26, 2022 (Dkt. #174) will need to be extended. The Parties anticipate it will take 90 days to complete the necessary remaining fact discovery will be concurrently filing a motion to extend in that regard.

8. This completes the Parties' Joint Status Report.

Dated: July 14, 2022

Respectfully submitted by:

For Plaintiff Larry Frazier

*For Defendants Wexford Health Sources,
Inc., and Dr. Merrill Zahtz*

By: /s/ Vincent C. Mancini

By: /s/ Victor F. Price

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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2022, I caused the foregoing document to be filed electronically with the Clerk of the Court through ECF and to be served upon all counsel of record by filing the same with the CM/ECF system.

By: /s/Victor F. Price